

From: Richard Liebowitz <RL@liebowitzlawfirm.com>
Subject: Re: Seidman v. Gax- Document Production and Amended Answers
Date: August 28, 2018 at 11:21:10 PM EDT
To: Laurence <ls@laurencesinger.com>

I don't see any issue with the amended answers. Want to meet and confer?

Best,

Richard Liebowitz, Esq.
Liebowitz Law Firm, PLLC
t.516-233-1660

This message is intended only for the designated recipient(s). It may contain confidential or proprietary information and may be subject to the attorney-client privilege or other confidentiality protections. If you are not a designated recipient, you may not review, copy or distribute this message. If you receive this in error, please notify the sender by reply e-mail and delete this message. Thank you.

On Tue, Aug 28, 2018 at 11:20 PM Laurence <ls@laurencesinger.com> wrote:

Richard, I read the amended answers, if you are referencing the amended answers sent previously. These are the reason the Letter and Motion were filed, as stated in both the Letter and Motion.

No reason to jump on the phone as there is an outstanding Order.

Laurence

On Aug 28, 2018, at 2:58 PM, Richard Liebowitz <RL@liebowitzlawfirm.com> wrote:

Laurence,

Did you read our amended answers? Let me know if you want to jump on the phone. Thank you.

On Thursday, August 23, 2018, Richard Liebowitz <RL@liebowitzlawfirm.com> wrote:
Laurence,

From: Laurence <ls@laurencesinger.com>
Subject: Re: Seidman v. Gax- Document Production and Amended Answers
Date: August 29, 2018 at 8:43:33 AM EDT
To: Richard Liebowitz <RL@liebowitzlawfirm.com>

Please send the most recent amended answers in a new email thread so I can make sure we are speaking about the same documents.

On Aug 28, 2018, at 11:21 PM, Richard Liebowitz
<RL@liebowitzlawfirm.com> wrote:

I don't see any issue with the amended answers. Want to meet and confer?

Best,

Richard Liebowitz, Esq.
Liebowitz Law Firm, PLLC
t.516-233-1660

This message is intended only for the designated recipient(s). It may contain confidential or proprietary information and may be subject to the attorney-client privilege or other confidentiality protections. If you are not a designated recipient, you may not review, copy or distribute this message. If you receive this in error, please notify the sender by reply e-mail and delete this message. Thank you.

On Tue, Aug 28, 2018 at 11:20 PM Laurence <ls@laurencesinger.com> wrote:

Richard, I read the amended answers, if you are referencing the amended answers sent previously. These are the reason the Letter and Motion were filed, as stated in both the Letter and Motion.

No reason to jump on the phone as there is an outstanding Order.

Laurence

On Aug 28, 2018, at 2:58 PM, Richard Liebowitz
<RL@liebowitzlawfirm.com> wrote:

Laurence,

Did you read our amended answers? Let me know if you want to jump on the phone. Thank you.

From: Richard Liebowitz <RL@liebowitzlawfirm.com>
Subject: Fwd: Seidman v. Gax- Document Production and Amended Answers
Date: August 29, 2018 at 8:46:47 AM EDT
To: Laurence <ls@laurencesinger.com>

----- Forwarded message -----

From: Richard Liebowitz <RL@liebowitzlawfirm.com>
Date: Thursday, August 23, 2018
Subject: Seidman v. Gax- Document Production and Amended Answers
To: Laurence <ls@laurencesinger.com>

Laurence,

Attached please find plaintiff's document production and amended answers to your document requests and interrogatories. My client is still looking for a couple of more items, so please give me until Friday.

Thank you.

Best,

Richard Liebowitz, Esq.
Liebowitz Law Firm, PLLC
t.516-233-1660

This message is intended only for the designated recipient(s). It may contain confidential or proprietary information and may be subject to the attorney-client privilege or other confidentiality protections. If you are not a designated recipient, you may not review, copy or distribute this message. If you receive this in error, please notify the sender by reply e-mail and delete this message. Thank you.

--

Best,

Richard Liebowitz, Esq.
Liebowitz Law Firm, PLLC
t.516-233-1660

From: Laurence <ls@laurencesinger.com>
Subject: Re: Seidman v. Gax- Document Production and Amended Answers
Date: August 29, 2018 at 9:29:06 AM EDT
To: Richard Liebowitz <RL@liebowitzlawfirm.com>

These are the amended responses you sent to me on August 23rd. The next day I filed the Motion to Compel and on August 25th I filed the Letter Motion, both referencing the amended responses as not being responsive to the discovery requests. On August 28th, the Court issued an Order that discovery must be complied with in accordance with the Federal Rules of Civil Procedure.

If this is a accurate description of this part of the discovery process, then what is there to speak about?

On Aug 29, 2018, at 8:46 AM, Richard Liebowitz <RL@liebowitzlawfirm.com> wrote:

----- Forwarded message -----

From: Richard Liebowitz <RL@liebowitzlawfirm.com>
Date: Thursday, August 23, 2018
Subject: Seidman v. Gax- Document Production and Amended Answers
To: Laurence <ls@laurencesinger.com>

Laurence,

Attached please find plaintiff's document production and amended answers to your document requests and interrogatories. My client is still looking for a couple of more items, so please give me until Friday.

Thank you.

Best,

Richard Liebowitz, Esq.
Liebowitz Law Firm, PLLC
t.516-233-1660

This message is intended only for the designated recipient(s). It may contain confidential or proprietary information and may be subject to the attorney-client privilege or other confidentiality protections. If you are not a designated recipient, you may not review, copy or distribute this message. If you receive this in error, please notify

From: Richard Liebowitz <RL@liebowitzlawfirm.com>
Subject: Re: Seidman v. Gax- Document Production and Amended Answers
Date: August 30, 2018 at 1:39:05 AM EDT
To: Laurence <ls@laurencesinger.com>

Laurence,

There is nothing wrong with these amended responses. If you do not withdraw your motion, we plan on seeking fees against you and your firm for having to respond. Please withdraw from Friday at 12pm. Thank you.

Best,

Richard Liebowitz, Esq.
Liebowitz Law Firm, PLLC
t.516-233-1660

This message is intended only for the designated recipient(s). It may contain confidential or proprietary information and may be subject to the attorney-client privilege or other confidentiality protections. If you are not a designated recipient, you may not review, copy or distribute this message. If you receive this in error, please notify the sender by reply e-mail and delete this message. Thank you.

On Wed, Aug 29, 2018 at 9:30 AM Laurence <ls@laurencesinger.com> wrote:

These are the amended responses you sent to me on August 23rd. The next day I filed the Motion to Compel and on August 25th I filed the Letter Motion, both referencing the amended responses as not being responsive to the discovery requests. On August 28th, the Court issued an Order that discovery must be complied with in accordance with the Federal Rules of Civil Procedure.

If this is a accurate description of this part of the discovery process, then what is there to speak about?

On Aug 29, 2018, at 8:46 AM, Richard Liebowitz <RL@liebowitzlawfirm.com> wrote:

----- Forwarded message -----

From: Laurence <ls@laurencesinger.com>
Subject: Re: Seidman v. Gax- Document Production and Amended Answers
Date: August 30, 2018 at 7:26:40 AM EDT
To: Richard Liebowitz <RL@liebowitzlawfirm.com>

Richard, from the amended responses I read, interrogatories were still objected to and response were still not provided. Only two documents were provided in response to the document requests, one contract and one news article seemingly unrelated to this case.

If this is correct, I suggest you review the Judge's Order, dated August 28, 2018. If this is not correct, then please provide any information that would clarify these points.

Laurence

On Aug 30, 2018, at 1:39 AM, Richard Liebowitz
<RL@liebowitzlawfirm.com> wrote:
Laurence,

There is nothing wrong with these amended responses. If you do not withdraw your motion, we plan on seeking fees against your and your firm for having to respond. Please withdraw from Friday at 12pm. Thank you.

Best,

Richard Liebowitz, Esq.
Liebowitz Law Firm, PLLC
t.516-233-1660

This message is intended only for the designated recipient(s). It may contain confidential or proprietary information and may be subject to the attorney-client privilege or other confidentiality protections. If you are not a designated recipient, you may not review, copy or distribute this message. If you receive this in error, please notify the sender by reply e-mail and delete this message. Thank you.

On Wed, Aug 29, 2018 at 9:30 AM Laurence <ls@laurencesinger.com> wrote:

These are the amended responses you sent to me on August 23rd. The next day I filed the Motion to Compel and on August 25th I filed the Letter Motion, both referencing the amended responses as not being

responsive to the discovery requests. On August 28th, the Court issued an Order that discovery must be complied with in accordance with the Federal Rules of Civil Procedure.

If this is an accurate description of this part of the discovery process, then what is there to speak about?

On Aug 29, 2018, at 8:46 AM, Richard Liebowitz
<RL@liebowitzlawfirm.com> wrote:

----- Forwarded message -----

From: Richard Liebowitz <RL@liebowitzlawfirm.com>

Date: Thursday, August 23, 2018

Subject: Seidman v. Gax- Document Production and Amended Answers

To: Laurence <ls@laurencesinger.com>

Laurence,

Attached please find plaintiff's document production and amended answers to your document requests and interrogatories. My client is still looking for a couple of more items, so please give me until Friday.

Thank you.

Best,

Richard Liebowitz, Esq.
Liebowitz Law Firm, PLLC
t.516-233-1660

This message is intended only for the designated recipient(s). It may contain confidential or proprietary information and may be subject to the attorney-client privilege or other confidentiality protections. If you are not a designated recipient, you may not review, copy or distribute this message. If you receive this in error, please notify the sender by reply e-mail and delete this message. Thank you.

--